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FILE NO.: 00638.1399

February 6, 2023

By ECF

Honorable Pamela K. Chen
 United States District Court
 Eastern District of New York
 100 Federal Plaza
 Central Islip, New York 11722

Re: *Sky Medical Supply, Inc. v. SCS Support Claims Services, Inc., et al.*
Docket Number 12-cv-06383

Dear Judge Chen:

We are counsel to Dante Brittis, M.D.; Joseph C. Cole, M.D.; Christopher Ferrante, D.C.; Robert A. Sohn, M.D.; and Julio Westerland, M.D. (the "GW Defendants"). We write, on consent of counsel for all parties connected to the motions, to request an extension of the current briefing schedule for Defendants' motions for summary judgment.

The Court granted the GW Defendants, Nationwide Defendants,¹ and Patient Focus² leave to move for summary judgment on the statute of limitations grounds. The GW Defendants have twice sought to amend the briefing schedule due to an unexpected health issue of magnitude effecting the supervising partner. The Court granted those requests, and the current deadline for moving papers is February 10, 2023, with opposition to be served on May 10, 2023 and any replies to be served on June 22, 2023. The GW Defendants are again seeking an extension of those deadlines because the significant health issue is continuing, and due to a sudden death in the immediate family of the other attorney working on this case (which occurred yesterday). We have conferred with counsel for Plaintiff, the Nationwide Defendants, and the Patient Focus Defendants, and have agreed to amend the schedule as follows:

March 10, 2023	Defendants to serve their motions for summary judgment
June 30, 2023	Plaintiff to serve opposition papers
August 31, 2023	Defendants to serve reply papers

¹ Nationwide Management Inc., Mikael Oshiashvili, Benjamin Osiashvili, Svetlana Osiashvili, and Aleksey Vayner.

² Patient Focus Medical Examinations, PC, Tatiana Sharahy.

The Hon. Pamela K. Chen
February 6, 2023
Page 2

Respectfully submitted,

/s/ Justin M. Vogel

Justin M. Vogel

cc: All Counsel of Record (*via ECF*)